



# CONSOLIDATED PLAN

## PROGRAM YEAR 2018

### Action Plan

July 1, 2018 through June 30, 2019

For Housing and Community Development

Prepared by:

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## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

This Annual Plan outlines the use of Program Year 2018 federal funds granted to Shelby County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. The Plan covers the period from July 1, 2018 through June 30, 2019 and marks the fifth year of the Consolidated Plan 5-Year Strategy. Activities associated with the use of these funds are designated for the Shelby County Urban Entitlement Area including the municipalities of Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington as well as unincorporated areas of Shelby County. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the Shelby County Urban Entitlement Area including areas with concentrations of low- and moderate-income residents. Shelby County will also use this plan as a basis for coordination with other federal, state, and local programs and initiatives. A share of funds will also be available for use in support of and to match a Lead Hazard Control Grant and Healthy Homes Grant County-wide (in accordance with grant enrollment priorities) to benefit low- and moderate-income residents with children less than six years of age.

The Shelby County Urban Entitlement Area is a diverse community composed of a mixture of suburban and rural development. The map below depicts the Shelby County Urban County Entitlement Area (outlined in bold black lines) as well as low- and moderate income census tracts in Shelby County.

At the end of the 2017 PY, SCDH canceled the Public Service Project- Fair Housing and reallocated \$50,000 in CDBG funds to the Housing Rehabilitation program and/or Minor Home Repair Program. In the absence of the Public Service Project- Fair Housing, the SCDH is equipping staff with HUD developed training in order to complete the HUD Housing Counselor Certification. SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to the community by providing counseling services as well as workshops and training on topics related to fair housing rights.

Finally, SCDH proposes applying all CDBG program income, excess budgeted funds, and unallocated funds received during each program year toward the Housing Rehabilitation program and/or Minor Home Repair Program.

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

High priority needs identified in the 5 Year Strategy planning process to be addressed through this Annual Plan include:

- Housing Rehabilitation, Modification, & Repair; and
- Parks and Recreational Facilities.

The 5 Year Strategy established three goals to guide the use of CDBG and HOME funds from June 1, 2014 through June 30, 2019 in order to address high priority needs identified in the 5 year Strategy. These three goals are described and summarized below.

Goal 1. Preserve the existing housing stock & create opportunities for affordable housing.

Categories: Affordable Housing & Non-Homeless Special Needs

Needs Addressed: Housing Rehabilitation, Modification, & Repair

Outcomes: Rehabilitated owner-occupied housing units

Goal 2. Reduce the harmful affects of lead-based paint

Categories: Affordable Housing

Needs Addressed: Housing Rehabilitation, Modification, & Repair

Outcomes: Lead-safe housing units with children less than 6 years of age

Goal 3. Improve communities

Categories: Accessibility & Non-Homeless Special Needs

Needs Addressed: Flood drain improvements, parks and recreational facilities, senior centers sidewalks, and street improvements

Outcomes: Public facilities or infrastructure activities

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

SCDH has been a CDBG Urban Entitlement grantee since 1992 and a HOME participating jurisdiction since 1994. Since that time, SCDH has sought to expand its partnership base in order to utilize existing resources more efficiently and create greater impact for each HUD dollar spent in Shelby County. Since becoming a grantee, SCDH has inspected over 1,000 housing units, fully rehabilitated more than 800 homes, made more than 800 units lead safe, and completed more than 100 public facility and infrastructure projects. This record of successful accomplishment has been integral to regularly exceeding program goals and benchmarks and has established the capacity to implement the strategies necessary to address the high priority housing and community development needs described in this Annual Plan.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

SCDH held a public hearing to solicit input on community development needs on February 13, 2018 to inform preparation of this proposed plan. The hearing was advertised in the *Memphis Flyer*, the *Daily News*, the *Millington Star*, the *Bartlett Express*, the *Germantown News*, the *Collierville Herald*, *La Prensa* (in Spanish), and the *Tri-State Defender*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. No one attended the hearing and no comments were received. SCDH also met with the Urban County Consortium on December 4, 2017 to review the planning process and discuss community development needs to also inform preparation of the proposed Annual Plan. During the 30-day review period of the proposed Annual Plan, SCDH held a public hearing to discuss the proposed plan on April 18, 2018. The hearing was advertised in the *Memphis Flyer*, the *Daily News*, the *Millington Star*, the *Bartlett Express*, the *Germantown News*, the *Collierville Herald*, *La Prensa* (in Spanish), and the *Tri-State Defender*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. Two citizens attended the hearing and asked thoughtful questions and made comments regarding the work that SCDH plans to do with PY 2018 grant funds. During the 30-day review period, SCDH also received phone calls from two citizens that either saw a copy for the proposed annual plan or saw the ad for the April 18, 2018 public hearing. More details regarding citizen participation are included in the attachments.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No public comments were received as a result of the public hearing on February 13, 2018. Two citizens attended the public hearing on April 18, 2018 and one of the attendees had comments regarding the community outreach efforts of SCDH. Mr. James Stokes and Mrs. Myrthel Stokes asked questions regarding where services were provided, community outreach efforts, and funding. Mr. Stokes commented that the Memphis Flyer is not the target audience for the public hearing ad. Mr. Stokes saw the public hearing ad in the Memphis Flyer and that is how/why he attended the public hearing. I (Sydney McGhee) explained to Mr. Stokes that SCDH's target audience is all Shelby County citizens and that since changing our Citizen Participation Plan, 2/3 citizen participation stemmed from the Memphis Flyer ad. I also explained that SCDH advertises in all of the municipal papers as well as a paper that is mainly consumed by the Latino community and another mainly consumed by the African-American community. Mr. Stokes requested a copy of the PowerPoint presentation via email as well as a copy of the proposed plan; both were sent via email the next morning. No written comments were received regarding the proposed annual plan.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

At the time of preparation of this finalized plan, no comments or views were intentionally not accepted.

## **7. Summary**

SCDH anticipates receiving \$1,204,506.00 in Program Year 2018 CDBG funds and \$406,554.00 in Program Year 2018 HOME funds to address high priority needs. By addressing these needs, SCDH will advance the goals to preserve the existing housing stock and create opportunities for affordable and fair housing, reduce the harmful affects of lead-based paint to include healthy homes interventions, and improve communities in Shelby County. During the fifth year of the 5-Year Strategy period, as described in the One Year Action Plan for the period of July 1, 2018 through June 30, 2019, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Rehabilitation of 20 homes including 5 with accessibility modifications for residents with special needs,
2. Creation of 15 lead-safe housing units,
3. Acquisition of one unit to create an affordable housing opportunity utilizing CHDO funds, and
4. Implementation of one park improvement project.

Planned activities for the program year to address impediments to fair housing in order to affirmatively further fair housing are described in the grantee unique appendices.

Finally, this Annual Plan marks the fifth year under the current 5-Year Strategy.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SHELBY COUNTY	
CDBG Administrator	SHELBY COUNTY	Department of Housing
HOPWA Administrator		
HOME Administrator	SHELBY COUNTY	Department of Housing
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

### Narrative (optional)

SCDH served as the lead agency responsible for preparing this Annual Plan and is also the major public agency responsible for administering all CDBG and HOME assisted programs covered by this Annual Plan. SCDH will be advised by the Urban County Consortium and will be under the direct authority of the Mayor of Shelby County, who will have final approval for all expenditures. The Urban County Consortium is composed of the Mayor of Shelby County and the Mayors of the six Entitlement Area municipalities (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington), or their respective designee.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

SCDH has taken steps to enhance coordination with public and assisted housing providers, providers of services for the non-homeless having special needs, the Continuum of Care, and Urban County Consortium members.

#### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

SCDH coordinated with all municipalities in the Urban County Consortium (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington) in preparing the 5 Year Strategy that guides this Annual Plan. SCDH relied upon information and input from a wide range of housing providers and health/mental health agencies, especially for drafting the needs assessment, including The Community Alliance for the Homeless, The City of Memphis Division of Housing and Community Development, the Plough Foundation, the Memphis Mental Health Institute, and the Shelby County Health Department Ryan White Program.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Information provided by the Community Alliance for the Homeless was used for the homeless special needs section of the Needs Assessment, and the Alliance was asked to review and comment on the initial draft of this section in the Needs Assessment.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Shelby County is not a recipient of ESG funds and therefore did not consult with the Continuum(s) of Care to determine how to allocate ESG funds, determine performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

### **2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	ARLINGTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.
2	<b>Agency/Group/Organization</b>	BARTLETT
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.
3	<b>Agency/Group/Organization</b>	COLLIERVILLE
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.

4	<b>Agency/Group/Organization</b>	Germantown
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.
5	<b>Agency/Group/Organization</b>	Lakeland
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.
6	<b>Agency/Group/Organization</b>	MILLINGTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and Community Development Needs and the Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, this municipality was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. A representative from this municipality was provided a copy of the proposed annual plan.

7	<b>Agency/Group/Organization</b>	City of Memphis, HCD
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As another recipient of CDBG and HOME funds, City of Memphis HCD was provided a copy of the proposed annual plan due to the work they do.
8	<b>Agency/Group/Organization</b>	Green and Healthy Homes Initiative Group (GHHI)
	<b>Agency/Group/Organization Type</b>	Collaborative Group with healthy homes as a priority
	<b>What section of the Plan was addressed by Consultation?</b>	Proposed Annual Plan
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Memphis GHHI is comprised of a diverse group of organizations. The organizations that are Representative included: Shelby County Health Department, Le Boneheur Children's Hospital, Memphis Area Association of Governments (MAAG), Memphis HCD, United Housing Inc., Memphis Habitat for Humanity, Memphis Light Gas and Water (MLGW), Community Foundation of Greater Memphis, BLDG Memphis, and the TN Housing Development Agency. These organizations interact with clients that face various challenges and housing needs so their input was sought on the proposed annual plan.

### Identify any Agency Types not consulted and provide rationale for not consulting

Effort was made to consult widely with partners and organizations that have expressed interest in Department of Housing's programs and also circulate the proposed Annual Plan widely for review and comment. No agencies were deliberately not consulted.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Community Alliance for the Homeless	SCDH does not receive direct funding for homelessness prevention. However, Shelby County Government supports the efforts of the Community Alliance for the Homeless. The Alliance was asked to provide input regarding homelessness needs into the proposed plan.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

A copy of the proposed annual plan was sent to the listserv of LinchHub which is the Memphis Public Library listserv for community information.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

SCDH held a public hearing to solicit input on community development needs on February 13, 2018 to inform preparation of this proposed plan. The hearing was advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and the *Tri-State Defender*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. No one attended the hearing and no comments were received. SCDH also met with the Urban County Consortium on December 4, 2017 to review the planning process and discuss community development needs to also inform preparation of the proposed Annual Plan. During the 30-day review period of the proposed Annual Plan, SCDH held a public hearing to discuss the proposed plan on April 18, 2018. The hearing was advertised in the *Memphis Flyer*, *the Daily News*, *the Millington Star*, *The Bartlett Express*, *The Germantown News*, *The Collierville Herald*, *La Prensa* (in Spanish), and the *Tri-State Defender*. Details regarding the hearing were also advertised on the SCDH website. Those with special needs were encouraged to contact SCDH in advance of the hearing so that arrangements for accommodations could be made. Two citizens attended the hearing and asked thoughtful questions and made comments regarding the work that SCDH plans to do with PY 2018 grant funds. During the 30-day review period, SCDH also recieved phone calls from two citizens that either saw a copy for the proposed annual plan or saw the ad for the April 18, 2018 public hearing. More details regarding citizen participation are included in the attachments.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	N/A	No comments received.	Not Applicable - Public Notice published in the MEMPHIS FLYER on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	
2	Newspaper Ad	Non-targeted/broad community	N/A	No comments received.	Not Applicable - Public Notice published in the DAILY NEWS on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Germantown Community	N/A	No comments received.	Not Applicable - Public Notice published in the GERMANTOWN NEWS on January 17, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	
4	Newspaper Ad	Minorities	N/A	No comments received.	Not Applicable - Public Notice published in the TRI-STATE DEFENDER on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad	Bartlett Community	N/A	No comments received.	Not Applicable - Public Notice published in the BARTLETT EXPRESS on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	
6	Newspaper Ad	Collierville community	N/A	No comments received.	Not Applicable - Public Notice published in the COLLIERVILLE HERALD on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Newspaper Ad	Millington Community	N/A	No comments received.	Not Applicable - Public Notice published in the MILLINGTON STAR on January 18, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	
8	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish	N/A	No comments received.	Not Applicable - Public Notice published in the LA PRENSA LATINA on January 21, 2018 to promote a public hearing on Community Development Needs held on February 13, 2018.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Internet Outreach	Non-targeted/broad community	N/A. Public notice was posted on the Housing department's main website landing page under "Notice of Public Hearings" from January 4, 2018 through February 13, 2018.	No comments received.	No comments received.	<a href="http://www.shelbycountyttn.gov/388/Housing">http://www.shelbycountyttn.gov/388/Housing</a>
10	Public Meeting	Non-targeted/broad community	No one attended aside from SCDH staff.	No comments were received.	Public hearing on Community Development Needs held on February 13, 2018. No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Newspaper Ad	Non-targeted/broad community	2 attendants came to the April 18 2018 public hearing due to the ad in the MEMPHIS FLYER on March 29, 2018. Also received one phone call from a citizen who saw this ad.	One person who attended the public hearing commented on SCDH community outreach efforts. The other participation that stemmed from this ad was in the form of questions, not comments.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
12	Newspaper Ad	Non-targeted/broad community	N/A	No comments received.	Not Applicable - Public Notice published in the DAILY NEWS on March 29, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	
13	Newspaper Ad	Germantown Community	N/A	No comments received.	Not Applicable - Public Notice published in the GERMANTOWN NEWS on March 28, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
14	Newspaper Ad	Minorities	N/A	No comments received.	Not Applicable - Public Notice published in the TRI-STATE DEFENDER on March 29, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	
15	Newspaper Ad	Bartlett Community	N/A	No comments received.	Not Applicable - Public Notice published in the BARTLETT EXPRESS on March 29, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
16	Newspaper Ad	Collierville Community	N/A	No comments received.	Not Applicable - Public Notice published in the COLLIERVILLE HERALD on March 29, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	
17	Newspaper Ad	Millington Community	N/A	No comments received.	Not Applicable - Public Notice published in the MILLINGTON STAR on March 29, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
18	Newspaper Ad	Minorities	N/A	No comments received.	Not Applicable - Public Notice published in the LA PRENSA LATINA on April 1, 2018 to promote a public hearing on Community Development Needs held on April 18, 2018.	
19	Internet Outreach	Non-targeted/broad community	No comments received.	No comments received.	N/A. Public notice was posted on the Housing department's main website landing page under "Notice of Public Hearings" from April 1, 2018 through May 1, 2018.	<a href="http://www.shelbycountyttn.gov/388/Housing">http://www.shelbycountyttn.gov/388/Housing</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Public Hearing	Non-targeted/broad community	2 Shelby county citizens attended the hearing.	One attendee commented on the community outreach efforts of SCDH.	N/A.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The anticipated resources in this Annual Plan are based upon allocations announced in May 2018.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,204,506	10,000	0	1,214,506	0	Expected amounts are based on the fact that this plan is for the last year in the current consolidated planning period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	406,554	15,000	0	421,554	0	Expected amounts are based on the fact that this plan is for the last year in the current consolidated planning period.

**Table 5 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funds will leverage additional resources including approximately \$75,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$91,500 in local funds to meet HOME matching requirements.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

It is not anticipated that publically owned land or property located within the jurisdiction will be used to address the needs identified in the plan.

### **Discussion**

Since these anticipated resources are based upon the May 1, 2018 HUD announcement of Program Year 2018 allocations, it is not anticipated that these resources will change during the term of this Annual Plan.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
<b>1</b>	Preserve & create housing affordability & choice	2014	2018	Affordable Housing Non-Homeless Special Needs Fair Housing	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice	CDBG: \$673,820 HOME: \$472,373	Public service activities for Low/Moderate Income Housing Benefit: 90 Households Assisted Homeowner Housing Rehabilitated: 25 Household Housing Unit Other: 1 Other
<b>2</b>	Reduce the harmful affects of lead-based paint	2014	2018	Lead-Safe Housing for Families with Children under 6 Years of Age	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice	CDBG: \$50,000	Other: 20 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Improve communities	2014	2018	Non-Housing Community Development	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice Flood Drain Improvements Parks and Recreational Facilities Senior Centers Sidewalks Street Improvements Water and Sewer Improvements	CDBG: \$200,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 25 Households Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	Goal Name	Preserve & create housing affordability & choice
	Goal Description	Housing Rehabilitation; CHDO Housing
2	Goal Name	Reduce the harmful affects of lead-based paint
	Goal Description	Minor Home Repair to Address Lead Hazards
3	Goal Name	Improve communities
	Goal Description	Bartlett Municipal Park

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Funds allocated during the 2018 Program Year will be used for the following activities: Housing rehabilitation and minor home repair using CDBG and HOME funds, CHDO affordable housing project

using the HOME CHDO set-aside, a community development infrastructure project(s) using CDBG funds, program delivery costs using CDBG funds, and administration and planning costs using CDBG and HOME funds.

At the end of the 2017 PY, SCDH canceled the Public Service Project- Fair Housing and reallocated \$50,000 in CDBG funds to the Housing Rehabilitation program and/or Minor Home Repair Program. In the absence of the Public Service Project- Fair Housing, the SCDH is equipping staff with HUD developed training in order to complete the HUD Housing Counselor Certification. SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to the community by providing counseling services as well as workshops and training on topics related to fair housing rights.

Finally, SCDH proposes applying all CDBG program income, excess budgeted funds, and unallocated funds received during each program year toward the Housing Rehabilitation program and/or Minor Home Repair Program.

### Projects

#	Project Name
1	Housing Rehabilitation and Minor Home Repair
2	CHDO Affordable Housing Development
3	Bartlett Municipal Park Improvements
4	CDBG Program Delivery
5	Administration and Planning

**Table 7 - Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocation priorities were based upon needs identified through the citizen participation process as well as from the guidance and input of the Urban County Consortium throughout the planning process. Obstacles to address underserved needs identified in the planning process are primarily a function of limited resources.



## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Housing Rehabilitation and Minor Home Repair
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	CDBG: \$673,820
	<b>Description</b>	Scattered site housing rehabilitation and minor home repair.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 low- and-moderate income owner-occupied homes including 15 lead-safe housing units under the Lead Hazard Control Program (Minor Home Repair) and some elderly households and some households with children less than 6 years of age (25 homeowner rehabilitations and 10 units made lead safe).
	<b>Location Description</b>	To be determined based upon client intake/enrollment.
	<b>Planned Activities</b>	Rehabilitation of 35 owner-occupied houses to bring homes into code compliance and minor home repair to produce 15 lead safe housing units for families/households with children less than six years of age.
2	<b>Project Name</b>	CHDO Affordable Housing Development
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Preserve & create housing affordability & choice
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	HOME: \$60,983
	<b>Description</b>	Development of affordable housing by a CHDO using HOME CHDO set-aside funds.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Acquisition and rehabilitation of a vacant housing unit to create and affordable housing unit for sale to a qualifying low/moderate income homebuyer.
	<b>Location Description</b>	Shelby County Urban County Entitlement Area

	<b>Planned Activities</b>	Development of affordable housing by a CHDO using HOME CHDO set-aside funds.
<b>3</b>	<b>Project Name</b>	Bartlett Municipal Park Improvements
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Improve communities
	<b>Needs Addressed</b>	Parks and Recreational Facilities
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	ADA upgrades to Bartlett Municipal Park.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The number of families that will benefit is to be determined based upon location and service area of the project.
	<b>Location Description</b>	Bartlett Municipal Park in Bartlett, Tennessee.
	<b>Planned Activities</b>	Planned activities include a public facility(ies) or improvement(s) to address high priority community development needs.
<b>4</b>	<b>Project Name</b>	CDBG Program Delivery
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	CDBG: \$212,660
	<b>Description</b>	Implementation of CDBG programs.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 low- and moderate-income single family households as well as area beneficiaries in community development project areas.
	<b>Location Description</b>	Varies
	<b>Planned Activities</b>	Activities to support implementation of CDBG activities.
	<b>Project Name</b>	Administration and Planning

5	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice Parks and Recreational Facilities
	<b>Funding</b>	CDBG: \$128,026 HOME: \$40,655
	<b>Description</b>	General administrative and planning activities necessary to operate HOME and CDBG programs.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable
	<b>Location Description</b>	Not applicable.
	<b>Planned Activities</b>	Not applicable

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis.

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Shelby County Urban County Entitlement Area	85
Shelby County, Tennessee	15

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Since concentrations of low- and moderate-income areas in the jurisdiction are limited, direct assistance is prioritized to be available to eligible beneficiaries throughout the entitlement area and jurisdiction, while area-benefit activities are directed to benefit eligible low- and moderate-income areas.

### **Discussion**

Housing services offered in accordance with the Strategic Plan will be made available on a county- or jurisdiction-wide basis. Non-housing community development activities will be rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable. A majority of funds is expected to be spent in the Entitlement Area with 15% of the funds being spent in support of the Lead Hazard Control and Healthy Homes Grant in accordance with grant enrollment priorities.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	26
Special-Needs	5
Total	31

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	30
Acquisition of Existing Units	1
Total	31

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Of the 31 households to be supported as indicated in Table 6, 30 are expected to be through housing rehabilitation or minor home repair including 5 families with special needs (particularly disabled or elderly/frail elderly). The remaining household to be supported is expected to be through the creation of 1 CHDO unit.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Millington Housing Authority requires little assistance from the SCDH. Kefauver Estates, the remaining public housing facility in the Urban County, is operated by the Memphis Housing Authority. SCDH will continue to assist both housing authorities as needed to ensure that its needs are met and the goal of providing safe, decent, and affordable housing for its residents is obtained.

### **Actions planned during the next year to address the needs to public housing**

In Program Year 2018, the Shelby County Department of Housing will continue its efforts to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the Millington Housing Authority.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Memphis Housing Authority has a Resident Advisory Board (RAB) established to provide activities and advocate for the rights of residents. The Memphis Housing Authority RAB is also responsible for assisting with and commenting on Memphis Housing Authority's 5 -Year Planning process. The Millington Housing Authority also has a Resident Advisory Board that meets annually. Additionally, MillHA publishes a newsletter to engage and inform residents.

As for homeownership, SCDH plans to continue implementing a homebuyer downpayment assistance program during the program year. This program could benefit qualified public housing residents seeking to own their own home. This program is funded using state and local funds. MillHA indicated it does not have plans to encourage public housing residents to participate in homeownership.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Neither PHA is designated as troubled.

### **Discussion**

Both public housing authority operations located within the Urban County Entitlement Area are small and rely upon Resident Advisory Boards to encourage resident involvement in management. Neither Memphis nor Millington Housing Authorities are designated as troubled.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Since Shelby County is not a recipient of ESG grant funds, it has insufficient resources for direct expenditures to carry out homeless reduction activities. Efforts to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

The Memphis/Shelby County Mayors' Action Plan to End Homelessness, the guiding set of strategies for the Memphis/Shelby County Continuum of Care (CoC), focuses on the evidence-based strategies of permanent housing and rapid rehousing along with targeting the best fit interventions to the appropriate subpopulation. The plan calls for an increase in permanent housing and a decrease in transitional housing. The CoC has reallocated 100% of our CoC funded transitional housing units to permanent housing programs, either rapid rehousing or permanent supportive housing. Based on the 2016 Consolidated Application (submitted in September, 2016), we no longer have transitional housing beds funded through the CoC, down from 854 units in the 2011 application. Since 2012, overall homelessness in Memphis and Shelby County has fallen by 27%. (Source: Community Alliance for the Homeless 2015 Point in Time Count.)

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The CoC's one-year goal to reduce and ending homelessness by looking to other low-income and subsidized housing programs to meet our goal for additional housing opportunities. This includes continuing to partner with the local housing authorities to create a preference for households experiencing homelessness. We are preparing a protocol on how to best implement this preference. We are looking at other communities that have successfully implemented the preference. In addition, we are identifying and engaging with HUD-assisted multi-family property owners to educate them on the process of designating a homeless preference for their projects. Part of this process includes support from the CoC to the owners in the implementation of the preference and maintaining the role of coordinating the process.

The community's outreach and engagement approach includes a 24/7 phone-based hotline, two walk-in centers, and roving street outreach presence. For families with children, we have a centralized intake that screens, on average 177 families per month and our phone-based hotline receives

318 calls/month. The central intake number is based on the average for FY16. These numbers are believed to be lower than prior years due to increased telephone screening and community awareness that divert families who are not literally homeless walked in for services. Those who do not meet HUD's definition of literally homeless are receiving mediation and other prevention services. Through Rapid Rehousing efforts, the community is housing an all- time high number of families. As a result, families are not timing out of shelter and coming back in for another shelter placement.

Recently, through implementation of the Coordinated Entry system for individuals, a team that includes street outreach and housing providers, meets weekly to discuss and prioritize the vulnerable unsheltered individuals using a "By Name List". This has brought to light the importance of street outreach and the need to enhance funding for outreach and SOAR activities. SOAR is an approach for people who were experiencing or at risk of homelessness to have quick access to SSI/SSDI benefits. We expect to pursue funding to expand and enhance our street outreach presence in the coming years. We have also established an electronic assessment and referral tool ([www.memphishomelessoptions.org](http://www.memphishomelessoptions.org)) to maximize our existing resources and make it easier for people experiencing homelessness to seek help.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Memphis has identified the need for free/no fee emergency shelter especially for single women and families with children. In the 2015 CoC Competition, the Memphis/Shelby County CoC did not receive renewal funding for 31 units of transitional housing for households with children. We are developing a strategy to obtain funding for additional units of emergency shelter to cover the deficit.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The US Veterans Administration awarded two local providers, Catholic Charities of West Tennessee and Memphis Area Legal Services, funding in the amount of \$1.3 million to launch a Rapid Rehousing initiative under the Supportive Services for Veteran Families (SSVF) program. Approximately 60% of those receiving assistance under the program are homeless households with a veteran, and 40% are households that are imminently homeless. Families receiving assistance through this initiative, along with the Rapid Rehousing programs operated by other service providers, experience shorter homeless episodes than other families, and based on newly released research, have lower rates of return to homelessness than other similar households.

We currently have a total of 2,192 units of permanent housing including 1,003 units for chronically



homeless individuals and families. In addition, in the recently announced awards from the 2016 HUD CoC Competition, we received an additional 15 units of permanent supportive housing for veterans and 3 Rapid Rehousing program grants that will serve a total of 331 households including 20 beds for Transition Age Youth (18-24). These units became available near the end of Spring 2017.

Alliance Healthcare Services launched a 3-year program to provide services to homeless veterans and other chronically homeless individuals. The services are delivered using a Critical Time Intervention (CTI) model of case management. CTI is a time-limited evidence based practice (EBP) that focuses on transitioning people from the streets and shelters into permanent housing. The services are designed to help individuals successfully navigate the difficult transition from homelessness to housing. The program has been used effectively with veterans and people with substance abuse or co-occurring disabilities. This program is in its final year and is expected to serve 80 households during this final year. The agency has identified a SAMSHA grant that will allow the program to continue. If funded, the services could continue up to 5 additional years.

In an effort to prevent a return to homelessness for individuals who were chronically homeless, we continue to maintain a Housing First Assertive Community Treatment (ACT) team. The team provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Alliance Healthcare Services includes mental health professionals, physical health professionals, case managers, and peer support specialists. AHS serves at least 80 individuals who are housed with permanent supportive housing providers. The services we expect people leaving institutions to need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The Memphis/Shelby County Emergency Housing Partnership will serve approximately 40 families (147 individuals) with homeless prevention assistance in the upcoming year through the Emergency Solutions Grant program. Additionally, 40% of households served through the SSVF program will receive prevention assistance. In 2016, MIFA's central intake triaged 3,491 families and provided emergency services of with rent, mortgage or utility assistance to prevent homelessness. MIFA helps mediate with families who avoid homelessness as a result. MIFA Emergency Services program is expected to assist over 4,000 families.

Our partnerships with the public institutions including the Department of Children's Services (DCS),

corrections, and hospitals continue to improve. We have developed a collaborative partnership with the DCS Regional Administrator. DCS has a funding mechanism that can be used to pay rental assistance to families whose only barrier to family reunification is homelessness. CAFTH and MIFA are working with DCS to help them learn the components of the Rapid Rehousing model. We are also working with the state DCS to develop a mechanism to prevent homelessness for youth aging out of foster care.

We are currently implementing a pilot with a local hospital to design and implement a service pathway that effectively addresses housing and supportive service needs by leveraging CAFTH's Coordinated Entry System. Members of the Coordinated Entry system are individual nonprofits and behavioral health providers that offer services to address the range of needs of homeless individuals. As the local homeless services intermediary, CAFTH is responsible for coordinating services across providers, streamlining the intake process for homeless individuals, providing a shared case management system, and administering overall quality assurance for the network.

We would like to secure funding and a non-profit sponsor that could provide respite care to those who are homeless and have had or are awaiting surgery or other medical procedures that make it unsafe for them to discharge to homelessness.

## **Discussion**

The homeless and other special needs section was developed with the assistance from the Community Alliance for the Homeless. Since Shelby County is not a recipient of ESG grant funds, it has insufficient resources for direct expenditures to carry out homeless reduction activities. Efforts to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Based on the 2011 Shelby County Analysis of Impediments to Fair Housing, the following are public policy related barriers to affordable housing:

Land Acquisition Costs- High cost makes affordable housing development in the urban county very difficult, if not impossible.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing- The tax rate for multi-family rental housing is substantially higher than the rate for single-family housing.

Lack of other resources and incentives to develop affordable housing in the consortium area- There are little or no other governmental or philanthropic resources or incentives for affordable housing development within urban county.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Land Acquisition Costs- SCDH anticipates using HOME CHDO funds to assist nonprofit affordable housing developers with costs, including acquisition costs, necessary to create affordable housing opportunities.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing- SCDH intends to coordinate efforts with THDA to make information available about Tax Credits, their use in Shelby County and other State programs available at the local level, including outreach workshops to provide direct information on both state and local initiatives.

Lack of other resources and incentives to develop affordable housing in the consortium area- SCDH intends to leverage nonfederal resources, (e.g. state and local funds for downpayment assistance) to meet affordable housing needs. SCDH also intends to continue assisting philanthropic efforts to meet the housing needs of low-income and special needs groups (e.g. the Plough Foundation's Aging in Place Initiative).

### **Discussion:**

Barriers to affordable housing coincide with many impediments to fair housing, as protected classes often are low-income and face disparate impacts by virtue of income as well as race or other protected classes. As a result, the identified barriers to affordable housing mirror some of the impediments to fair housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Shelby County plans other actions during the Program year including actions to address obstacles to meeting underserved needs, to foster and maintain affordable housing, to reduce lead-based paint hazards, to reduce the number of poverty-level families, to develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

SCDH will continue to work with and coordinate activities with the Shelby County Community Services Agency (CSA) in their efforts to meet the underserved needs in the Shelby County Urban County Entitlement Area. CSA offers various programs targeting individuals and families with low- to moderate-incomes such as rent/mortgage assistance, utility assistance, and referrals for the homeless population.

Additionally, SCDH will provide referrals as necessary to the Aging Commission of the Mid-South. The Aging Commission provides assistance to the senior population of Shelby County through programs including Alzheimer's service, home care, legal assistance, long term care ombudsman services, nutrition services, public guardianship, and transportation.

At the end of the 2017 PY, SCDH canceled the Public Service Project- Fair Housing and reallocated \$50,000 in CDBG funds to the Housing Rehabilitation program and/or Minor Home Repair Program. In the absence of the Public Service Project- Fair Housing, the SCDH is equipping staff with HUD developed training in order to complete the HUD Housing Counselor Certification. SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to the community by providing counseling services as well as workshops and training on topics related to fair housing rights. Workshops will be facilitated at least one per quarter regarding relevant topics identified by the department's Fair Housing Coordinator.

Finally, the SCDH will continue to coordinate with the Plough Foundation's Aging Initiative Bringing awareness to the comprehensive needs of the older citizens of our community needs to be a strategic

priority because of its profound impact on our society.

### **Actions planned to foster and maintain affordable housing**

The two goals emphasizing fostering and maintaining affordable housing are:

- Preserve the existing housing stock and create opportunities for affordable housing, and
  
- Reduce the harmful affects of lead-based paint.

These goals will be accomplished through the rehabilitation of housing in the Urban County and addressing lead-based paint hazards and providing healthy homes interventions (including repairs to address deteriorated painted surfaces) in eligible homes in Shelby County having children less than 6 years of age.

### **Actions planned to reduce lead-based paint hazards**

During the program year, SCDH will continue to implement the Lead Hazard Control Program funded in part by a 2016 Lead Hazard Control Grant through the HUD Office of Healthy Homes and Lead hazard Control. Furthermore, through the Housing Rehabilitation Program, SCDH will continue to complete lead-based paint risk assessments on all target housing with rehabilitation work being completed in accordance with the HUD Lead Safe Housing Rule. Finally, SCDH will require any housing rehabilitation conducted using HOME CHDO set-aside funds to comply with the HUD Lead Safe Housing Rule as well.

### **Actions planned to reduce the number of poverty-level families**

SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished. SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished.

Additionally, the primary aim of Shelby County Government's Community Services Agency (CSA) is breaking the generational cycle of poverty requires changes in attitude, living conditions, education, and

aspirations of its victims.

Working with nonprofit organizations, other branches of government, other governmental agencies, and citizen committees, the agency plans and carries out programs for low-income residents. These programs emphasize self-help.

### **Actions planned to develop institutional structure**

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the program year and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

During the 2018 Program Year, SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

In order to enhance coordination between public and private housing and social service agencies during the year, SCDH will continue to strengthen existing and seek out and solidify new partnerships with housing, health, and social service agencies that will enable Shelby County to make progress towards achieving the goals of the Consolidated Plan. Furthermore, the department will continue to work with local non-profits, CHDOs, and other agencies carrying out housing and community redevelopment efforts in order enhance overall coordination of activities at the local level.

### **Discussion:**

In addition to these other described actions planned for the program year, SCDH intends to continue addressing impediments to fair housing identified in the Shelby County Analysis of Impediments to Fair Housing and also plans to continue efforts to provide outreach and training to Section 3 contractors.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed was estimated based on an average of program income accrued to previous years as reported in the last three Consolidated Annual Performance Reports (CAPERs). SCDH will not be receiving any Section 108 loan proceeds, surplus funds from urban renewal settlements, grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan, or income from float-funded activities. SCDH does not plan to expend funds on any Urgent Need activities. SCDH intends to use 100% of CDBG funds (subject to the low/mod benefit calculation) for activities that benefit persons of low- and moderate-income.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No HOME funds will be used as forms of investment that are not described in Section 92.205. SCDH will leverage the use of HOME funds through its partnerships with CHDOs who will provide private sources of funding.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

When HOME funds are utilized for a homebuyer activity, contracts and restrictive covenants will ensure affordability of units acquired with HOME funds. Developers will be required to include a recapture provision in all agreements in order to ensure affordability. When new construction occurs using HOME funds, the affordability period will be determined as follows:

- 5 years when using less than \$15,000 in HOME funds,
- 10 years when using \$15,000 to \$40,000 in HOME funds, and
- 15 years when using more than \$40,000 in HOME funds.

If the property is resold or foreclosed upon during the designated period to a buyer who is not an eligible low-income purchaser, SCDH will recapture the original amount of HOME funds invested from net sales proceeds. However, if proceeds are insufficient to recapture the full HOME investment plus enable the homeowner a fair return of personal funds invested in the downpayment, principal payments, and capital improvements, SCDH may allow recaptured HOME funds to be reduced on a pro rata basis as provided in the HOME Final Rule, or subsequent HUD regulations. All HOME contracts and restrictive covenants contain safe harbor language approved by HUD.

Prior to the sale of a HOME-assisted unit to a first-time homebuyer, the developer must provide SCDH with documentation regarding applicant eligibility, evidence property will constitute their principal residence, and copies of deed provisions regarding resale of the property providing it will remain affordable for the designated period and providing for recapture of HOME funds by SCDH if the property is not sold to an eligible low-income buyer.

Fair return includes seller's payments which are long lasting in nature and add to the capital value of the property. These include additions, upgrades or modifications, and/or improvements that increase the size of the property or create a material addition. Such activities need to be documented by approved permits evidencing completed improvements or executed improvement contracts. Adding appliances such as garbage disposals, water heaters, cabinets, electrical repairs,



landscaping, plumbing fixtures, carpets, painting, kitchen exhaust fans, shower doors, and tub enclosures are not eligible for consideration. These guidelines are placed in agreements with developers who shall include references to the recapture guidelines in associated sales contracts, deeds of trust, mortgages, and deed restrictions.

- When the initial homebuyer sells the HOME assisted unit to a non-eligible family, the seller will be entitled to pay-off of first/second mortgages, recover investment (or downpayment), and documented capital improvements expenses in that order. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis.

- The sales price may not prevent a low-income family from purchasing the home. In each case, the following applies in order: the seller can pay-off a first/second mortgage, the seller must determine if he will lower the sales price to comply with HOME regulations governing resale to eligible low-income families or, should proceeds remain, the seller is entitled to recover out-of-pocket downpayment costs and documented capital improvements expenses. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis. The amount repaid shall be reduced by a pro rata fraction according to the anniversary of the closing date.

- If homeowner does not comply with the recapture option, has not made capital improvements, and seeks to sell the property at a price beyond the affordability of a low-income purchaser, the seller will be entitled to pay-off of first/second mortgages. Remaining proceeds may be recaptured by SCDH in an amount up to the full amount of the HOME subsidy assistance.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Units acquired with HOME funds are primarily associated with the CHDO program. In an effort to maintain the focus of the HOME Program, CHDOs shall include a provision in deeds of trust that ensures the housing unit assisted with HOME funds is maintained as an affordable housing unit for low-income families throughout the period of affordability. The deed of trust will need to have legal language in it that indicates whether the recapture or resale option was selected.

Recapture: The legal mechanism used to enforce the repayment of all or a portion of the direct HOME subsidy if the homeowner decides to sell the house within the affordability period. In selecting the recapture option the homeowner may sell the property to any willing buyer. The City requires full repayment of the direct HOME subsidy when resale occurs during the affordability period.

Resale: This option ensures that the HOME-assisted unit remains affordable over the entire affordability period. Therefore if the house is sold the new purchaser must be low-income in accordance with HOME regulations and the house must be the buyer's principle residence.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

SCDH will not be using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

SCDH will continue to market programs in an effort to attract more minority contractors. Currently, in an effort to recruit maximum minority participation, SCDH encourages minority contractors to get their General Contractors License, advertises rehabilitation bids in the local newspaper, runs public notices soliciting contractors (especially MBEs and WBEs) to participate in rehabilitation programs, provides direct mailings for each bid package to contractors on the rehabilitation vendors list and continuously seeks other methods of recruiting minority general contractors who can bid on larger rehabilitation activities. SCDH also works with the Shelby County Equal Opportunity Compliance Office and the Purchasing Department to ensure that minority-and women-owned firms take advantage of Shelby County's Locally-Owned Small Business Program (LOSBS). During the program year, SCDH will continue to enroll and assist MBEs and WBEs to become more competitive and successful in the local market.

## Attachments

## **Citizen Participation Comments**

4/13/2018- Received a phone call from Ms. Brenda Hampton, Realtor, asking me to explain the public notice that she was in the Memphis Flyer. A client of hers asked her about the notice and she wanted clarity in order to provide the client with accurate details. I (Sydney McGhee) spoke with Ms. Hampton for approx. 8mins and explained the contents of the public notice. I mainly explained the way Shelby County receives HUD entitlement funds and what they do with those funds based on priorities. I also spoke in detail about the planned community development project in Bartlett as well as the CHDO set aside. I also mentioned the Public Hearing on 3/18/2018 and encouraged Ms. Hampton to tell her client or any other person that had questions to come to the hearing for more details and Q and A. Ms. Hampton thanked me for the information and said that it all made sense to her as she was somewhat familiar with the terms due to her background.

4/18/2018- two attendees at the Public Hearing; Mr. James Stokes and Mrs. Myrthel Stokes of 3161 Tippah Cove. The two attendees had questions about where services were provided, community outreach efforts, and funding. Mr. Stokes said that the Memphis Flyer is not the target audience for the public hearing ad. Mr. Stokes saw the public hearing ad in the Memphis Flyer and that is how/why he attended the public hearing. I (Sydney McGhee) explained to Mr. Stokes that SCDH's target audience is all Shelby County citizens and that since changing our Citizen Participation Plan, 2/3 citizen participation steemed from the Memphis Flyer ad. I also explained that SCDH advertises in all of the municipal papers as well as a paper that is mainly consumed by the Latino community and another mainly consumed by the African-American community. Mr. Stokes requested a copy of the PowerPoint presentation via email as well as a copy of the proposed plan; both were sent via email the next morning.

4/25/2018- Received a phone call from Ms. Janice Mundy, a citizen of Memphis, asking for a PDF copy of the Proposed Annual Plan. Ms. Mundy saw a copy for public review at the Benjamin Hooks Library and wanted a copy for personal review. I (Sydney McGhee) informed Ms. Mundy of the deadline to submit public comments and I also explained the way Shelby County receives entitlement funds. Ms. Moody had questions about why the city of Memphis wasn't included in the Urban County and I explained that the city elects to receive and administer their own allocation; contact Memphis HCD for more information regarding their use of entitlement funds. I also encouraged Ms. Mundy to contact the Memphis 3.0 office to get her questions regarding city of Memphis "master" plans answered. I emailed Ms. Mundy a link to the Proposed Annual Plan shortly after the end of our phone conversation.

**Program Year 2018**  
**Planned Activities to Address Impediments to Fair Housing in order to**  
**Affirmatively Further Fair Housing**

**Impediment # 1. There is an inadequate supply of decent, affordable housing for people of low and moderate income in Shelby County, as a whole, and particularly in areas outside the City of Memphis.**

*SCHD will communicate with Shelby County Land Bank to discuss and facilitate the development of affordable housing with properties acquired through tax sale. SCHE will also work with local CHDO's to discuss ways to add more affordable housing units county wide.*

**Impediment # 2. There is a lack of accessible housing for people with disabilities throughout Shelby County.**

*SCHD will continue to work with organizations such as The Memphis Center For Independent Living and others groups who work with citizens with disabilities to market our in-house programs such as rehab and down payment assistance to help individuals get into affordable housing and make their existing homes more visitable and handicap accessible.*

*Any Residential Housing Supported With CDBG or HOME Funds Should Be Conditioned on Compliance With Visitability Standards.*

*The Department will incorporate Handicapped and Visitability standards into rehabilitation activities when the opportunity presents itself. This was a specific recommendation of the new AI and Shelby County will utilize its rehab program to take advantage of this opportunity when it presents itself. By modifying individual housing units through the rehab program, Shelby County can increase accessibility of housing stock over the long term for individuals in need of modified housing in order to live independently.*

**Impediment # 3. Rental property managers throughout Shelby County do not understand the duty to make reasonable accommodations for people with disabilities.**

*At the end of the 2017 PY, SCDH canceled the Public Service Project- Fair Housing and reallocated \$50,000 in CDBG funds to the Housing Rehabilitation program and/or Minor Home Repair Program. In the absence of the Public Service Project- Fair Housing, the SCDH is equipping staff with HUD developed training in order to complete the HUD Housing Counselor Certification. SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to the community by providing counseling services as well as workshops and training on topics related to fair housing rights, including reasonable accommodations.*

**Impediment # 4.** There is abundant evidence of discriminatory lending throughout Shelby County, which ultimately denies protected class members housing choice and quality of life.

*SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to: (1) provide assistance to low-income individuals who believe that they have experienced discriminatory actions related to securing housing within the Urban County; (2) assist the Housing Department in carrying out fair housing related workshops/seminars on relevant fair housing topics, (3) work to expand fair housing awareness throughout the Urban County, the public sector, and private sector.*

**Impediment # 5.** Discrimination and redlining in homeowners insurance affects housing affordability and quality of life for many protected class members.

*Shelby County will engage in discussions with the City of Memphis and others to explore ways to execute an In-Depth Study of Homeowners Insurance Underwriting and how it affects affordability and quality of life for protected class members as part of the Assessment of Fair Housing to be under development during the program year.*

**Impediment # 6.** Members of the Hispanic community in Shelby County are heavily concentrated in mobile home parks, which are in flood plains, where they are exploited because of language barriers and lack of sophistication in consumer issues.

*According to the office of Construction Code Enforcement there are currently requirements in place that require mobile home parks which are in flood plains to be two feet above the flood plain. This was put in place after flooding that took place in certain areas.*

*Work with the Shelby County Hispanic/Minority Affairs Officer and housing organizations (such as United Housing, Inc.) who work with the growing Hispanic community to expand awareness of housing assistance programs throughout the Urban County community.*

**Impediment # 7.** There is a Critical Shortage of Appropriate Rental Housing for Large Families throughout Shelby County.

*While the County is limited by the fact that it (1) has no Housing Authority or access to Housing Choice Vouchers (both the City of Memphis), (2) does not issue Low Income Housing Tax Credits (the State of Tennessee), and (3) does not finance or directly subsidize housing construction (the result of limited funding and authority); the Department will not ignore these issues. The Department will work to address these issues by building on dialogue and partnerships between the public and private sector that were developed out of the Shelby County Greenprint and the Fair Housing Equity Assessment (FHEA) that was a part of that Regional Planning effort and seek new strategic opportunities through the development of the*

*Analysis of Impediments to Fair Housing, in partnership with the City of Memphis, to get underway during the program year.*

**Impediment # 8. There is an inadequate public transit system throughout Shelby County, but particularly in areas outside the City of Memphis.**

*The Department will attend local Metropolitan Planning Organization (MPO) meetings in order to insure that transportation planning activities take housing issues in to consideration as part of the overall long range transportation planning process. As pointed out in the AI, transportation can be a major factor in a person's ability to secure housing of their choice. Typically, the MPO's Transportation Policy Board and its Engineering and Steering Committee meets each quarter during the year to focus on transportation and planning issues. Involvement in these meetings will increase the Department's involvement in the overall planning process and allow the Department greater input into how planning decisions can impact Fair Housing efforts in the community.*

**Impediment # 9.Exclusionary zoning prevents many members of protected classes from living in cities in the consortium.**

*The Shelby County Fair Housing Officer, will work with the Office of Construction Code Enforcement to Review Zoning Codes in Municipalities Within the Consortium to Identify any Provisions That Would Unnecessarily Exclude Protected Class Members and Meet with Local Officials to Consider Alternatives.*

**Impediment #10. Restrictive covenants in many planned developments in unincorporated Shelby County and cities in the consortium prevent many protected class members from living in the areas.**

*SCDH staff that have the HUD Housing Counselor Certification will serve as a resource to the community carrying out fair housing related workshops/seminars on relevant fair housing topics, including such trainings for local developers.*

**Impediment # 11.There are virtually no traditional public housing units in Shelby County outside the City of Memphis.**

*Recommended Action # 11. Memphis Housing Authority should seek to participate in HUD's Small Area Fair Market Rent Demonstration Project and, possibly consider raising approved rental amounts to 120% of the established Fair Market Rents to Help Offset the Lack of Traditional Public Housing in the Consortium Area.*

**Impediment # 12. Shelby County does not have a Fair Housing Ordinance.**

*An ordinance has been drafted for consideration.*

**Impediment # 13. Shelby County no longer has a Fair Housing Officer.**

*The position for a Fair Housing Officer has been filled.*

**Impediment #14. Many Governmental Actions Have an Unintended Adverse Effect on Housing Choice or Create an Unintended Barrier or Impediment to Fair Housing.**

*SCHD will provide Down Payment Assistance to low-to-moderate individuals and families throughout Shelby County in an effort to increase their ability to secure homes of their choosing in a community of their choice. The Department of Housing will make available a minimum of \$500,000.00 in Down Payment Assistance funding during the program year which is projected to assist 150 individuals/families in purchasing a home of their choice.*




## Grantee SF-424's and Certification(s)

OMB Number: 4040-0044  
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received:		4. Applicant Identifier:	
<input type="text"/>		<input type="text"/>	
5a. Federal Entity Identifier:		5b. Federal Award Identifier:	
<input type="text"/>		<input type="text"/>	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
<input type="text"/>		<input type="text"/>	
8. APPLICANT INFORMATION:			
* a. Legal Name: Shelby County Government			
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:	
62-000841		C411748890000	
d. Address:			
* Street1:	Shelby County Department of Housing		
* Street2:	1075 Mullins Station Road		
* City:	Memphis		
* County/Parish:	Shelby		
* State:	TN: Tennessee		
* Province:			
* Country:	USA: UNITED STATES		
* Zip / Postal Code:	38134		
e. Organizational Unit:			
Department Name:		Division Name:	
Housing		Planning & Development	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	Mr.	* First Name:	Scott
Middle Name:			
* Last Name:	Walkup		
Suffix:			
Title:	Administrator		
Organizational Affiliation:			
<input type="text"/>			
* Telephone Number:	901-222-7610	Fax Number:	901-222-7621
* Email:	scott.walkup@shelbycountyttn.gov		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="R: County Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Department of Housing &amp; Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.218"/> CFDA Title: <input type="text" value="Community Development Block Grants/Entitlement Grants"/>	
* 12. Funding Opportunity Number: <input type="text"/> * Title: <input type="text" value="Community Development Block Grants/Entitlement Grants"/>	
13. Competition Identification Number: <input type="text" value="N/A"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text" value="Shelby County, Tennessee.jpg"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Program Year 2018 CDBG Program"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	8 & 9
* b. Program/Project	3 & 9
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2018
* b. End Date:	06/30/2019
18. Estimated Funding (\$):	
* a. Federal	1,122,151.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	10,000.00
* g. TOTAL	1,132,151.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	
* First Name:	Mark
Middle Name:	B
* Last Name:	Luttrell
Suffix:	Jr.
* Title:	Mayor of Shelby County, Tennessee
* Telephone Number:	901-222-2000
Fax Number:	901-222-2005
* Email:	mark.luttrell@shelbycountyttn.gov
* Signature of Authorized Representative:	
* Date Signed:	05/09/2018

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

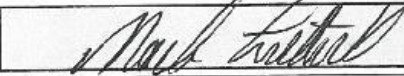
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11938; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

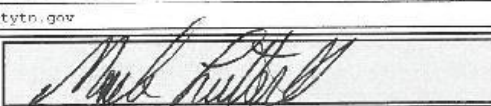
SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor of Shelby County, Tennessee
APPLICANT ORGANIZATION	DATE SUBMITTED
Shelby County Government	05/09/2018

SF 424D (Rev. 7-97) Back



Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received:		4. Applicant Identifier:
<input type="text"/>		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/>		<input type="text"/>
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
<input type="text"/>		<input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: Shelby County Government		
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:
52-000341		0411748890000
d. Address:		
* Street1: Shelby County Department of Housing		
Street2: 1075 Mullins Station Road		
* City: Memphis		
County/Parish: Shelby		
* State: TN: Tennessee		
Province:		
* Country: USA: UNITED STATES		
* Zip / Postal Code: 38134		
e. Organizational Unit:		
Department Name:		Division Name:
Housing		Planning & Development
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	Mr.	* First Name: Scott
Middle Name:		
* Last Name:	Walkup	
Suffix:		
Title: Administrator		
Organizational Affiliation:		
<input type="text"/>		
* Telephone Number:	901-222-7610	Fax Number: 901-222-7621
* Email:	scott.walkup@shelbycountyttn.gov	

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="8: County Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.239"/>	
<b>CFDA Title</b> <input type="text" value="HOME Investment Partnerships Program"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text" value="HOME Investment Partnerships Program"/>	
<b>13. Competition Identification Number:</b> <input type="text" value="N/A"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text" value="Shelby County, Tennessee.jpg"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Program Year 2018 HOME Grant Program"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="B &amp; G"/>	* h. Program/Project: <input type="text" value="8 &amp; 9"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2018"/>	* b. End Date: <input type="text" value="06/30/2019"/>
18. Estimated Funding (\$):	
* a. Federal	297,307.00
* b. Applicant	
* c. State	
* d. Local	66,855.00
* e. Other	
* f. Program Income	15,000.00
* g. TOTAL	379,202.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text"/>	* First Name: <input type="text" value="Mark"/>
Middle Name: <input type="text" value="H"/>	
* Last Name: <input type="text" value="Luttrell"/>	
Suffix: <input type="text" value="Jr."/>	
* Title: <input type="text" value="Mayor of Shelby County, Tennessee"/>	
* Telephone Number: <input type="text" value="901-222-2000"/>	Fax Number: <input type="text" value="901-222-2005"/>
* Email: <input type="text" value="mark.luttrell@shelbycountytg.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="05/09/2018"/>



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

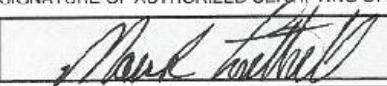
1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4753) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10 000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor of Shelby County, Tennessee
APPLICANT ORGANIZATION	DATE SUBMITTED
Shelby County Government	05/09/2018

SF-424D (Rev. 7-97) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing --** The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan --** It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

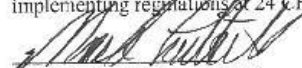
**Anti-Lobbying --** To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction --** The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan --** The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3 --** It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations of 24 CFR Part 135.

  
Signature/Authorized Official

Date 05/9/2018

### Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation --** It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan --** Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan --** It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds --** It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2018 , 2019 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

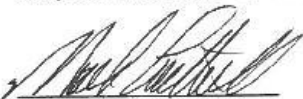
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature: Authorized Official

05/9/2018  
Date

Mayor of Shelby County, TN  
Title

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

	<b>NOT APPLICABLE</b>
Signature/Authorized Official	Date

Title

### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature/Authorized Official      05/9/2018  
Date

Mayor of Shelby County, TN  
Title



## ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from



publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
NOT APPLICABLE  
Date

\_\_\_\_\_  
Title

### HOPWA Certifications

The HOPWA grantee certifies that:

**Activities** — Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** — Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

_____	NOT APPLICABLE
Signature/Authorized Official	Date

\_\_\_\_\_  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.